

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 2:19cr 151
v.)	
)	18 U.S.C. § 1035
MARY OTTO)	False Statements Relating To
)	Health Care Matters
<i>Defendant.</i>)	(Count 1)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

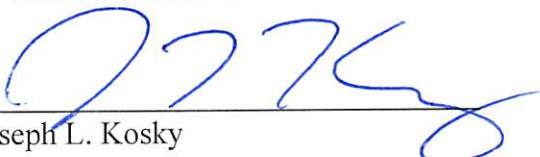
COUNT ONE

On or about October 28, 2016, in the Eastern District of Virginia, defendant MARY OTTO, in a matter involving a health care benefit program as defined in Title 18, United States Code, Section 24(b), knowingly and willfully did make a materially false, fictitious and fraudulent statement and representation, and make and use a materially false writing and document knowing the same to contain a materially false, fictitious and fraudulent statement and entry, in connection with the delivery of and payment for health care benefits, items and services, in that OTTO submitted and caused to be submitted to the Virginia Medicaid program, known as the Virginia Medical Assistance Program, a health care benefits program, a claim for health care benefit payment, which falsely and fraudulently represented that Dr. Udaya K. Shetty prescribed Adderall to P.W., when in truth and fact, OTTO wrote said prescription and lacked the lawful authority to do so.

(In violation of Title 18, United States Code, Section 1035.)

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:



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